

REMARKS

Claims 1-21 and 23-39 are pending in this application. By this amendment, claims 1, 11 and 24 have been amended, no new claims have been added and no claims have been canceled. Applicants appreciate that the finality of the rejection dated January 16, 2007, has been withdrawn and a new non-final rejection has been issued in place thereof. Applicants respond to that new non-final rejection below.

I. Claims Rejections under 35 U.S.C. § 103

The Examiner rejected claims 1-4, 8-14, 18-21, 23-27 and 31-39 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,035,121 to Chiu et al. (hereinafter Chiu) in view of U.S. Patent Publication No. 2003/0126559 to Fuhrmann (hereinafter Fuhrmann), and rejected claims 5-7, 15-17 and 28-30 under 35 U.S.C. § 103(a) as being unpatentable over Chiu in view of Fuhrmann and further in view of U.S. Patent No. 5,659,753 to Murphy et al. (hereinafter Murphy). These rejections are respectfully traversed.

With respect to amended claims 1, 11 and 24, Applicants' claimed invention recites, in amended claim 1, for example, a process for changing a computer system or application from a first language to at least a second language comprising the steps of: *inter alia*

performing said migration based on a module-type migration and based on said stored information to a stored link to provide a path backwards to reestablish the stored link using pre-migration information; and

performing said migration based on said stored migration information to a stored registry to synchronize the post-migration system structure.

That is to say, that Applicants' claimed invention employs a system conversion and updating process that may be separated into multiple layers so that different layers, components or modules may be used for different types of localized data (for instance, registry entries as opposed to shell folder objects). This module-type approach is shown for example in step 405 of Figure 4.

Applicants submit that, in dramatic contrast to the claimed invention, none of the asserted references, whether taken alone or in combination, at least disclose each and every element of

claim 1, including the features identified above. That is, as best understood, there is simply nothing in Chiu, Fuhrmann or Murphy that remotely disclose performing said migration based on a module-type migration and based on said stored information to a stored link to provide a path backwards to reestablish the stored link using pre-dash migration information; and performing said migration based on said stored in migration information to a stored registry to synchronize the post-migration system structure, as required by independent claim 1, for example.

Although, the Examiner has attempted to combine Chiu with Fuhrmann for direct rejection of independent claims 1, 11 and 24, for example, and the Examiner asserts that Fuhrmann discloses performing said migration modifies at least some core code of the target computer system from a language dependent form to a language independent form, which Applicants do not concede; Applicants maintain that this assertion even, *in arguendo* still fails to render obvious the new features recited above with regards to independent claims 1, 11 and 24.

Insofar as claims 2-4, 8-10, 12-14, 18-21, 23-27 and 31-39 depend directly from independent claims 1, 11 and 24, respectively, Applicants assert that these claims also are not rendered obvious by the asserted combination of Chiu in view of Fuhrmann for at least the same reasons recited above, as well as the additional recitations contained therein.

Accordingly, the Applicants respectfully request the withdrawal of the rejection of claims 1-4, 8-14, 18-21, 23-27 and 31-39 under § 103 over the combination of Chiu in view of Fuhrmann.

With regards to claims 5-7, 15-17 and 28-30 which are rejected under § 103 as being unpatentable over Chiu in view of Fuhrmann and further in view of Murphy, Applicants respectfully assert that for at least the same reasons recited above with regards to independent claims 1, 11 and 24 which claims 5-7, 15-17 and 28-30 depend from, claims 5-7, 15-17 and 28-30 are similarly not rendered obvious in view of the combinations of Chiu, Fuhrmann and Murphy, since Murphy fails to provide what is lacking with regards to Chiu and Fuhrmann.

Specifically, and even *in arguendo* that Murphy further discussed performing the step of unlocking shell folders, which Applicants do not concede; Murphy fails to render obvious at least amended independent claims 1, 11 and 24 for at least the reasons recited above with regards to the combination of Chiu and Fuhrmann exclusively. As such, Applicants respectfully request

the withdrawal of the rejections of claims 5-7, 15-17 and 28-30 under § 103 over the combination of Chiu, Fuhrmann and Murphy.

In view of the above amendment, Applicants believe the pending application is in condition for allowance.

II. Conclusion

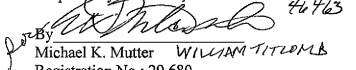
In view of the above remarks, it is believed that claims are allowable.

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact William D. Titcomb Reg. No. 46,463 at the telephone number of the undersigned below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37.C.F.R. §§1.16 or 1.14; particularly, extension of time fees.

Dated: February 11, 2008

Respectfully submitted,

for By  46463
Michael K. Mutter WILLIAM TITCOMB
Registration No.: 29,680
BIRCH, STEWART, KOLASCH & BIRCH, LLP
8110 Gatehouse Road
Suite 100 East
P.O. Box 747
Falls Church, Virginia 22040-0747
(703) 205-8000
Attorney for Applicant